

IN THE DISTRICT COURT IN AND FOR TULSA COUNTRICT COURT STATE OF OKLAHOMA

SANDRA LEE LICCIARDELLO, an individual,))) JAN 1 3 2012
Plaintiff,) SALLY HOWE SMITH, COURT CLERK STATE OF OKLA, TULSA COUNTY
vs.	CJ 12-00229
CARL E. REICHEL, an individual,	Judge MARY F. FITZGERALD
Defendant.	ATTORNEY LIEN CLAIMED

PETITION

COMES NOW Plaintiff, SANDRA LEE LICCIARDELLO, an individual, by and through her undersigned counsel of record, Lee I. Levinson, Terence P. Brennan, and Trevor R. Henson the law firm Levinson, Smith & Huffman, P.C., and for her cause of action against Defendant, CARL E. REICHEL, an individual, hereby alleges and states as follows:

- 1. Plaintiff, Sandra Licciardello, is a resident of Tulsa County, Oklahoma.
- 2. Defendant, Carl Reichel, is a resident of Osage County, Oklahoma.
- 3. The subject of this action occurred wholly in Tulsa County, Oklahoma.
- 4. Venue of this action is proper.
- 5. Jurisdiction of this action is proper.
- 6. On or about February 17, 2010, Plaintiff, Sandra Licciardello, was driving her automobile southbound on Highway 75 at or near the junction of the Creek Turnpike.
- 7. At the same time, Defendant, Carl E. Reichel, was driving his automobile on the same street in the same direction as Plaintiff and a short distance behind Plaintiff's car.
- 8. Plaintiff stopped due to traffic which had stopped directly in front of her. Defendant negligently ran into the back of Plaintiff's vehicle while still traveling at a considerable rate of speed.



9. As a result of the collision, Plaintiff suffered damages to Plaintiff's car and pain and injury to Plaintiff's body for which Plaintiff has incurred expenses for medical attention and hospitalization. Plaintiff also has suffered temporary and permanent physical impairment, which has prevented her from being able to effectively pursue her job as a realtor, resulting in lost wages. Plaintiff's injuries led to a loss of consortium and a general lowering of her standard of living.

WHEREFORE, Plaintiff, SANDRA LEE LICCIARDELLO, hereby prays that this Court will enter judgment against the Defendant, CARL E. REICHEL, for Plaintiff's injuries, loss of wages, medical bills, and pain and suffering, in an amount in excess of Seventy-Five Thousand Dollars (\$75,000), plus interest, costs including reasonable attorneys' fee, and any other expenses deemed just and proper in this matter.

Respectfully submitted,

Lee I. Levinson, OBA #5395

Terence P. Brennan, OBA #10036

Trevor R. Henson, OBA #30104

LEVINSON, SMITH & HUFFMAN, P.C.

1743 East 71st Street

Tulsa, OK 74136-5108

918.492.4433 - Tel

918.492.6224 - Fax

ATTORNEYS FOR PLAINTIFF